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16 Attorneys for WAYMO LLC

17 UNITED STATES DISTRICT COURT

18 NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

19 WAYMO LLC,

20 CASE NO. 3:17-cv-00939-WHA

21 Plaintiff,

22 **DECLARATION OF LINDSAY COOPER  
IN SUPPORT OF PLAINTIFF WAYMO  
LLC'S ADMINISTRATIVE MOTION TO  
FILE UNDER SEAL ITS OPPOSITION  
TO UBER'S MOTION TO COMPEL  
FURTHER DEPOSITION OF PIERRE-  
YVES DROZ**

23 vs.

24 UBER TECHNOLOGIES, INC.;  
25 OTTOMOTTO LLC; OTTO TRUCKING  
26 LLC,

27 Defendants.

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1 I, Lindsay Cooper, declare as follows:

2       1. I am an attorney licensed to practice in the State of California and am admitted to  
 3 practice before this Court. I am an associate at the law firm Quinn Emanuel Urquhart & Sullivan,  
 4 LLP, counsel for the Plaintiff Waymo LLC (“Waymo”). I have personal knowledge of the matters set  
 5 forth in this Declaration, and if called as a witness I would testify competently to those matters.

6       2. I make this declaration in support of Waymo’s Administrative Motion to File Under  
 7 Seal information in its Opposition to Uber’s Motion to Compel Further Deposition of Pierre-Yves  
 8 Droz (the “Administrative Motion”). The Administrative Motion seeks an order sealing the following  
 9 materials:

Document	Portions to Be Filed Under Seal	Designating Party
Portions of Exhibit 1 to Waymo’s Opposition to Uber’s Motion to Compel Further Deposition of Pierre-Yves Droz (“Exhibit 1”)	Portions highlighted in green	Waymo

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15       3. Exhibit 1 contains or refers to trade secret information, which Waymo seeks to seal.  
 16 Portions of Exhibit 1 (portions highlighted in green) contain, reference, and/or describe Waymo’s  
 17 asserted trade secrets. Specifically, the highlighted portions describe and reference the technical  
 18 details of one or more of Waymo’s asserted trade secrets.

19       4. I understand that these trade secrets are maintained as secret by Waymo (Dkt. 25-47)  
 20 and are valuable as trade secrets to Waymo’s business (Dkt. 25-31). The public disclosure of this  
 21 information would give Waymo’s competitors access to in-depth descriptions—and analysis—of the  
 22 functionality of Waymo’s autonomous vehicle system. If such information were made public, I  
 23 understand that Waymo’s competitive standing would be significantly harmed. Waymo’s request to  
 24 seal is narrowly tailored to only the confidential information.

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1 I declare under penalty of perjury under the laws of the State of California that the foregoing is  
2 true and correct, and that this declaration was executed in San Francisco, California, on August 9,  
3 2017.

4 By /s/ Lindsay Cooper  
5 Lindsay Cooper  
6 Attorneys for WAYMO LLC  
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## **SIGNATURE ATTESTATION**

Pursuant to Local Rule 5-1(i)(3), I attest under penalty of perjury that concurrence in the filing of this document has been obtained from Lindsay Cooper.

/s/ Charles K. Verhoeven  
Charles K. Verhoeven